

EXHIBIT “A”

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ATLANTIC COUNTY

JUL 27 2021

SHERIFF'S OFFICE
SHERIFF'S OFFICE**JEFF SHEPPARD, ESQUIRE**PO Box 169
Hammonton, NJ 08037
(609) 605-2717
Attorney for Plaintiff

LEGAL DEPARTMENT

JUL 2 2021

CREIGH BATTLE

Plaintiff(s)

V

CAESARS

Defendant(s)

: SUPERIOR COURT OF NEW JERSEY
: ATLANTIC COUNTY
: LAW DIVISION
:
: DOCKET NUMBER: ATL-L-1425-21

Civil Action

SUMMONS

FROM THE STATE OF NEW JERSEY TO THE DEFENDANT(S) NAMED ABOVE:

CAESARS

The plaintiff, named above, has filed a lawsuit against you in Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. An \$135.00 filing fee payable to clerk of Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense. If you do not file and serve a written answer or motion within 35 days, the court may enter judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment. If you cannot afford to pay an attorney, call a Legal Services Office in the county where you live. A list of these offices is attached. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

Dated: 8-21-21

/s/ Michelle Smith

MICHELLE SMITH, CLERK SUPERIOR COURT

Name of defendant to be served: CAESARS

Address for service:

2100 PACIFIC AVE. ATLANTIC CITY NJ

JEFF SHEPPARD, ESQUIRE #010281987

PO Box 169

Hammonton, New Jersey 08037

(609) 605-2717

Attorney(s) for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF NEW JERSEY
LAW DIVISION
IN AND FOR THE COUNTY OF ATLANTIC

CREIGH BATTLE

Plaintiff(s)

DOCKET NO. ATL-L-1978-21

vs.

CIVIL ACTION

CAESARS

Defendant(s)

COMPLAINT

Plaintiff Creigh Battle by way of complaint against
defendant(s) says:

FIRST COUNT

1. On or about May 11, 2019 plaintiff was a patron at the premises of defendant in Atlantic City, NJ.
2. At said time and place plaintiff acted in a careful and reasonable manner, free of any negligence whatsoever.
3. At said time and place a property owned by defendant was caused to be maintained in a negligent/careless and otherwise unreasonable manner. Said premises lacked proper security and/or personnel that would properly handle/direct patrons in a manner which would keep order.
4. Said premises condition was the result of the negligence of the defendant to this action.
5. As a result of said condition, plaintiff was caused to be assaulted by a patron and caused to incur severe injuries to his person.

6. Plaintiff's injuries were the direct and proximate result of the negligence of the defendant.
7. Defendant(s) had a duty to warn of said condition, take reasonable measures to alleviate/mitigate said condition, or take other measures that would be in keeping with imposed standards of the common law or of standards set by similarly situated property owners.

Wherefore plaintiff Creigh Battle demands judgment against defendant Caesars for his losses, damages, expenses, economic losses, medical bills, interests, attorney fees, costs of suit and any and all other consequential damages.

JURY DEMAND

Plaintiff demands a trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL


Pursuant to Rule 4:25-4, Jeff Sheppard, Esquire, is hereby designated as trial counsel for the within cause of action.

CERTIFICATION

Pursuant to the rules Governing the Courts of the State of New Jersey I hereby certify that the matter in controversy in this case is not the subject of any other action pending in any other court or of a pending arbitration proceeding nor is any other action or arbitration proceeding contemplated. There are no other parties who should be joined to this action to the best of my knowledge.

JEFF SHEPPARD ESQ.

BY:


JEFF SHEPPARD